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ATC ASSOCIATES INC.

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June 20, 2001

Mr. Steve Anderson
Director, Manufacturing
PACE INTERNATIONAL, LLC
5661 Branch Road
Wapato, Washington 98951

RE: BOILER HOUSE SOIL CONTAMINATION CLOSURE SAMPLING
WAPATO, WASHINGTON FACILITY
ATC PROJECT No. 25490.0102

Dear Mr. Anderson:

At the request of Pace International, LLC (Pace), ATC Associates Inc. (ATC) was contracted to perform closure soil sampling using limited access Strataprobe equipment at the above referenced facility. This sampling was necessary to determine if soil remediation activities conducted previously by Pace had been effective in lowering the amount of diesel based contamination in the soil beneath the concrete floor of the Boiler House.

Background

In early May 2000 maintenance personnel of the Wapato facility discovered a leak of No 5 Fuel Oil by observing the oil coming up through seams in the concrete floor. A portion of the concrete floor was removed at that time and it was discovered that a fuel line running between boilers had leaked sending an unknown amount of fuel oil into the soil beneath the Boiler House.

ATC was contacted by Envirotech Systems, Inc., a waste-hauling firm from Seattle, Washington, under contract to perform specialized waste transport, to provide consulting services and soil sampling related to this leak.

On May 13, 2000, ATC supervised limited access Strataprobe drilling performed by Transglobal Environmental Services Northwest, Inc. (TEG, currently doing business as Environmental Services Northwest). TEG performed a total of 11 borings in and around the Boiler House. Two or three soil samples (representing different depths in each boring) were collected by ATC and were analyzed on-site by TEG in a mobile chemistry laboratory. A total of 31 soil samples were collected, 7 of which were submitted to an outside laboratory for confirmation purposes. Soil samples collected from three boring locations, B-1, B-3, and B-10, showed levels of Total Petroleum Hydrocarbons (TPH) above regulatory clean up levels established by the State of Washington Department of Ecology under the Model Toxics Control Act Method A (MCTA Method A) (reference ATC Project No. 25445.0601).

Concentrations of 1,2-dichlorobenze, above the MCTA Method B (used for protection of groundwater) clean up level was detected in boring B-1. It was determined at that time that 1,2-dichlorobenze was not used at the Wapato Facility in any of the process or products manufactured there. It was additionally determined that a previous occupant of the facility may have used it.

The removal and disposal of the soil was handled by Pace. The excavation area was reportedly backfilled and the concrete floor restored before closure soil sampling was performed. ATC was not involved in this portion of the project.

Closure Soil Sampling

In May of 2001, Pace contracted with ATC to perform the closure sampling at the Wapato Facility. Once again limited access Strataprobe drilling was used to collect the closure soil samples. Environmental Services Northwest (ESN, formally Transglobal Environmental Services Northwest, Inc.) was utilized by ATC to provide the drilling.

The purpose of this drilling was to aid in the collection of soil samples to determine if the cleanup action was effective in removing the contamination previously found beneath the floor of the Boiler House. ATC accomplished this goal by drilling in the approximate locations (B-1, B-3, and B-10), and to approximately the same depths drilled in May of 2000. It should be noted that the point of refusal (depth at which the probe can no longer penetrate) was reached at approximately 6-feet in all of the borings, therefore exact depths could not be duplicated.

ATC collected a total of 6 soil samples from 3 boring locations. All of these samples were analyzed by Northwest Total Petroleum Hydrocarbon, Diesel Extension (NWTPH-Dx) and one sample, B-14-A was also analyzed for Polynuclear Aromatic Hydrocarbons (PAHs) using EPA Method 8021B. These samples were analyzed on May 25, 2001 by Northwest Chemistry Laboratory, a division of ESN. No diesel based constituents or PAHs were found detected in any of the soil samples. The sample results are summarized in the Tables below and the complete lab results are attached to this report.

SUMMARY OF NWTPH-Dx ANALYSIS (May 2001)
PACE INTERNATIONAL, LLC
WAPATO FACILITY

Sample Date	Sample Number	Approximate Pervious Location	Current Depth / Approximate Pervious Depth	Result in milligrams per kilo gram (mg/kg)
5-23-01	B-12-A	B-10	1 to 1.5 Feet / 1 to 1.8 Feet	None Detected
5-23-01	B-12-A Duplicate	B-10	3 to 4 Feet / 3 to 4 Feet	None Detected
5-23-01	B-12-B	B-10	3 to 4 Feet / 3 to 3.5 Feet	None Detected
5-23-01	B-13-A	B-3	0 to 1 Foot / 0 to 1 Foot	None Detected
5-23-01	B-14-A	B-1	0 to 2 Feet / 0 to 3 Feet	None Detected
5-23-01	B-14-B	B-1	3 to 3.5 Feet / 3 to 3.5 Feet	None Detected

SUMMARY OF SPECIFIC HALOGENATED AND AROMATIC HYDROCARBON ANALYSIS PACE INTERNATIONAL, LLC WAPATO, WASHINGTON FACILITY		
SAMPLE NUMBER	**CONSTITUENT**	**RESULT IN MILLIGRAMS PER KILO GRAM (mg/kg)**
B-14-A	Vinyl Chloride	None Detected
B-14-A	Benzene	None Detected
B-14-A	Toluene	None Detected
B-14-A	Ethylbenzene	None Detected
B-14-A	Total Xylenes	None Detected
B-14-A	1, 1-Dichloroethene	None Detected
B-14-A	Methylene Chloride	None Detected
B-14-A	*trans*-1, 2-Dichloroethene	None Detected
B-14-A	1,1-Dichloroethane	None Detected
B-14-A	*cis*- 1, 2- dichloroethene	None Detected
B-14-A	Chloroform	None Detected
B-14-A	1,1,1-Trichloroethane (TCA)	None Detected
B-14-A	Carbon Tetrachloride	None Detected
B-14-A	1,2-Dichloroethane	None Detected
B-14-A	Trichloroethene (TCE)	None Detected
B-14-A	1,1,2-Trichloroethane	None Detected
B-14-A	Tetrachloroethene (PCE)	None Detected
B-14-A	1,1,1,2-Tetrachloroethane	None Detected
B-14-A	1,1,2,2-Tetrachloroethane	None Detected

Conclusions and Recommendations

Based on the soil sample results reported above, it appears that the contaminated soil detected in May of 2000 has been successfully removed from beneath the Boiler House floor, and it appears that no further action is warranted at this time.

If you have any questions regarding this report, please feel free to call ATC at 509-662-7228.

Sincerely,

ATC ASSOCIATES INC.

Garry A. Crawford
Senior Project Manager

Thomas J. Mergy, RG
Operations Manager

Attachment: Laboratory Results

PRELIMINARY DATA

ESN NORTHWEST CHEMISTRY LABORATORY

PACE INTERNATIONAL PROJECT
Wapato, Washington
ATC Associates Inc.

Analyses of Diesel (NWTPH-Dx) in Soil

Sample Number	Date Analyzed	Surrogate Recovery (%)	Diesel (mg/kg)
Method Blank	5/25/01	99	nd
B-12-A	5/25/01	95	nd
B-12-A Dup.	5/25/01	99	nd
B-12-B	5/25/01	109	nd
B-13-A	5/25/01	97	nd
B-14-A	5/25/01	94	nd
B-14-B	5/25/01	107	nd
Method Detection Limits			20

"nd" Indicates not detected at the listed detection limits.
"int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE : 65% TO 135%

ANALYSES PERFORMED BY: Marilyn Farmer

ESN NORTHWEST CHEMISTRY LABORATORY

PRELIMINARY DATA

PACE INTERNATIONAL PROJECT
Wapato, Washington
ATC Associates Inc.

Specific Halogenated and Aromatic Hydrocarbons (EPA 8021B) in Soil

Sample Description		Method Blank	B-14-A
Date Sampled			5/23/01
Date Analyzed		5/25/01	5/25/01
	MDL (mg/kg)	(mg/kg)	(mg/kg)
Vinyl chloride	0.25	nd	nd
Benzene	0.05	nd	nd
Toluene	0.05	nd	nd
Ethylbenzene	0.05	nd	nd
Total Xylenes	0.05	nd	nd
1,1-Dichloroethene	0.05	nd	nd
Methylene chloride	0.05	nd	nd
trans-1,2-Dichloroethene	0.05	nd	nd
1,1-Dichloroethane	0.05	nd	nd
cis-1,2-Dichloroethene	0.05	nd	nd
Chloroform	0.05	nd	nd
1,1,1-Trichloroethane (TCA)	0.05	nd	nd
Carbon tetrachloride	0.05	nd	nd
1,2-Dichloroethane	0.05	nd	nd
Trichloroethene (TCE)	0.05	nd	nd
1,1,2-Trichloroethane	0.05	nd	nd
Tetrachloroethene (PCE)	0.05	nd	nd
1,1,1,2-Tetrachloroethane	0.05	nd	nd
1,1,2,2-Tetrachloroethane	0.05	nd	nd
Surrogate Recovery (%)		122	94

"nd" Indicates not detected at listed detection limit.
"int" Indicates that interference prevents determination.

ACCEPTABLE RECOVERY LIMITS FOR SURROGATE (Chlorobenzene): 65%- 135%

ANALYSES PERFORMED BY: Marilyn Farmer

ESN NORTHWEST CHEMISTRY LABORATORY

PRELIMINARY DATA

PACE INTERNATIONAL PROJECT
Wapato, Washington
ATC Associates Inc.

QA/QC Data - EPA 8021B Analyses

	Sample Description: MES-NE-4-16					
	Matrix Spike			Matrix Spike Duplicate		
	Spiked Conc. (mg/kg)	Measured Conc. (mg/kg)	Spike Recovery (%)	Spiked Conc. (mg/kg)	Measured Conc. (mg/kg)	Spike Recovery (%)
Benzene	1.00	1.10	110	1.00	1.10	110
Toluene	1.00	1.20	120	1.00	1.10	110
1,1-Dichloroethene	1.00	0.82	82	1.00	0.85	85
Trichloroethene (TCE)	1.00	1.10	110	1.00	1.06	106
Surrogate Spike			89			88

	Laboratory Control Sample		
	Spiked Conc. (mg/kg)	Measured Conc. (mg/kg)	Spike Recovery (%)
Benzene	1.00	1.20	120
Toluene	1.00	1.20	120
1,1-Dichloroethene	1.00	1.20	120
Trichloroethene (TCE)	1.00	1.10	110
Surrogate Spike			88

ACCEPTABLE RECOVERY LIMITS FOR MATRIX SPIKES: 65%-135%

ANALYSES PERFORMED BY: Marilyn Farmer